



**CT Corporation**  
**Service of Process Notification**

05/12/2022

CT Log Number 541562645

## EXHIBIT A

### Service of Process Transmittal Summary

**TO:** Laura Aznavoorian, Litigation Supervisor  
 Gallagher Bassett Services, Inc.  
 1901 S. Meyers Rd, Suite 200C  
 Oakbrook Terrace, IL 60181

**RE:** Process Served in Minnesota

**FOR:** Costco Wholesale Corporation (Domestic State: WA)

#### ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

**TITLE OF ACTION:** Re: Mary Tschida // To: Costco Wholesale Corporation

**CASE #:** None Specified

**NATURE OF ACTION:** Personal Injury - Failure to Maintain Premises in a Safe Condition

**PROCESS SERVED ON:** CT Corporation System, Inc, Saint Paul, MN

**DATE/METHOD OF SERVICE:** By Process Server on 05/12/2022 at 11:44

**JURISDICTION SERVED:** Minnesota

**ACTION ITEMS:** CT has retained the current log, Retain Date: 05/12/2022, Expected Purge Date: 05/27/2022

Image SOP

Email Notification, Laura Aznavoorian laura\_aznavoorian@gbtpa.com

Email Notification, Zois Johnston zjohnston@costco.com

Email Notification, Maureen Papier maureen\_papier@gbtpa.com

**REGISTERED AGENT CONTACT:** CT Corporation System, Inc  
 1010 Dale Street N  
 Saint Paul, MN 55117  
 866-665-5799  
 SouthTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RAMSEY

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SECOND JUDICIAL DISTRICT

Case Type: Personal Injury

Mary Tschida

Plaintiff,

**SUMMONS**

vs.

Demand for Jury Trial

Costco Wholesale Corporation,

Defendant.

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**TO: ABOVE-NAMED DEFENDANT COSTCO WHOLESALE CORPORATION.**

1. **YOU ARE BEING SUED.** The Plaintiff has started a lawsuit against you. The Plaintiff's Complaint against you is attached to this summons. Do not throw these papers away. They are official papers that affect your rights. You must respond to this lawsuit even though it may not yet be filed with the Court and there may be no court file number on this summons.

2. **YOU MUST REPLY WITHIN 21 DAYS TO PROTECT YOUR RIGHTS.** You must give or mail to the person who signed this summons a written response called an Answer within 21 days of the date on which you received this Summons. You must send a copy of your Answer to the person who signed this summons located at 444 Cedar Street, Suite 2300, St. Paul, MN 55101.

3. **YOU MUST RESPOND TO EACH CLAIM.** The Answer is your written response to the Plaintiff's Complaint. In your Answer you must state whether you agree or disagree with each paragraph of the Complaint. If you believe the Plaintiff should not be given everything asked for in the Complaint, you must say so in your Answer.

**4. YOU WILL LOSE YOUR CASE IF YOU DO NOT SEND A WRITTEN RESPONSE TO THE COMPLAINT TO THE PERSON WHO SIGNED THIS SUMMONS.**

If you do not Answer within 21 days, you will lose this case. You will not get to tell your side of the story, and the Court may decide against you and award the Plaintiff everything asked for in the complaint. If you do not want to contest the claims stated in the complaint, you do not need to respond. A default judgment can then be entered against you for the relief requested in the complaint.

**5. LEGAL ASSISTANCE.** You may wish to get legal help from a lawyer. If you do not have a lawyer, the Court Administrator may have information about places where you can get legal assistance. Even if you cannot get legal help, you must still provide a written Answer to protect your rights or you may lose the case.

**6. ALTERNATIVE DISPUTE RESOLUTION.** The parties may agree to or be ordered to participate in an alternative dispute resolution process under Rule 114 of the Minnesota General Rules of Practice. You must still send your written response to the Complaint even if you expect to use alternative means of resolving this dispute.

**PAIGE J. DONNELLY, LTD.**

Dated: May 11, 2022

By: /s/ Sheila K. Donnelly-Coyne  
Sheila K. Donnelly-Coyne, #237917  
Paige J. Donnelly, #23498  
Attorneys for Plaintiff  
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444 Cedar Street  
St. Paul, MN 55101  
651-222-2797  
[skdcefile@paigedonnelly.com](mailto:skdcefile@paigedonnelly.com)

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RAMSEY

SECOND JUDICIAL DISTRICT

Case Type: Personal Injury

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Mary Tschida

Plaintiffs,

**COMPLAINT**

vs.

Demand for Jury Trial

Costco Wholesale Corporation,

Defendant.

---

Plaintiff Mary Tschida, for her cause of action against the Defendant Costco Wholesale Corporation, herein, state and allege as follows:

**COUNT I.**

**I.**

That at all times mentioned herein, Plaintiff Mary Tschida was legally on the premises of Defendant Costco Wholesale Corporation, Store 1122 located at or near 13650 Elder Drive S, Baxter, MN 56425

**II.**

Defendant Costco Wholesale Corporation does business in Minnesota in multiple counties including Ramsey and has its registered office address located at 1010 Dale Street North St. Paul, MN 55117.

**III.**

That on or about July 9, 2019, Defendant Costco Wholesale Corporation, owned and operated the premises including the parking lot located 13650 Elder Drive South, Baxter, State of Minnesota.

IV.

That Defendant Costco Wholesale Corporation, carelessly and negligently, allowed the parking lot premises to be maintained in an unsafe condition.

V.

That Defendant Costco Wholesale Corporation negligently maintained the premises and parking lot causing unsafe conditions without taking steps to maintain the area to make the area safe for pedestrians.

VI.

That on or July 9, 2019, Plaintiff Mary Tschida was exiting her car and caused to slip and fall in the parking lot because of such unsafely maintained premises.

VII.

That when the incident was reported to the defendant immediately after the fall down, an employee of Costco told Mary and George Tschida that before the slip and fall occurred, the employee had started to clean up a spill of oil in that exact area but stopped before she was done and went inside because it started to rain. There were no warning signs placed that a slippery substance was present.

VIII.

After Mary fell, the same Costco employee then resumed cleaning the area while Mary and George Tschida were present and put warning cones and material on top of the oily substance.

## IX.

That as a direct and proximate result of Defendant Costco Wholesale Corporation, said negligence and said resulting fall down, Plaintiff Mary Tschida sustained bodily injuries and damage including fractures to her left extremity. Those such injuries are of a permanent and temporary nature. That Plaintiff Mary Tschida has suffered in the past, and will continue in the future to suffer physical and mental pain and discomfort because of such bodily injuries; she has in the past and will continue in the future to incur medical expenses because of such bodily injuries. That because of said injuries, pain and discomfort, and medical expenses, and property damage, Plaintiff Mary Tschida has incurred expenses and has generally been damaged in a sum in excess of Fifty Thousand and No/100 (\$50,000.00) Dollars.

WHEREFORE, Plaintiffs demand judgment against the Defendant in a sum in excess of Fifty Thousand and No/100 (\$50,000.00) Dollars, together with costs and disbursements and any other and further relief the Court may deem just.

**PAIGE J. DONNELLY, LTD.**Dated: May 11, 2022

By: /s/ Sheila K. Donnelly-Coyne  
 Sheila K. Donnelly-Coyne, 237917  
 Paige J. Donnelly, 23498  
 Attorney for Plaintiff  
 Suite 900  
 325 Cedar Street  
 St. Paul, MN 55101  
 651-222-2797  
[skdcefile@paigedonnelly.com](mailto:skdcefile@paigedonnelly.com)

ACKNOWLEDGMENT

The undersigned attorney acknowledges, pursuant to Minn. Stat. § 549.211, Subd. 2, that the attorney and the attorney's client are aware that upon a motion of a party, or upon the court's own motion, the court in its discretion may award to that party costs, disbursements, reasonable attorney's fees and witness fees if the party or attorney against whom costs, disbursements, reasonable attorney's and witness fees are charged acted in bad faith; asserted a claim or defense that is frivolous and that is costly to the other party; asserted an unfounded position solely to delay the ordinary course of the proceedings or to harass; or committed a fraud upon the court.

/s/ Sheila K. Donnelly-Coyne

Sheila K. Donnelly-Coyne